BEFORE THE POSTAL RATE COMMISSION WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2001

Docket No. R2001-1

RESPONSE OF UNITED STATES POSTAL SERVICE TO INTERROGATORIES OF OFFICE OF THE CONSUMER ADVOCATE (OCA/USPS-215-224)

The United States Postal Service hereby provides its responses to the following interrogatories of Office of the Consumer Advocate: OCA/USPS-215-224 filed on November 14, 2001.

Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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RESPONSE OF THE UNITED STATES POSTAL SERVICE TO INTERROGATORIES OF THE OFFICE OF CONSUMER ADVOCATE

OCA/USPS-215. Please refer to USPS-LR-J-58, LR58ASP.xls.

- a. Refer to worksheets "SP Letters (detailed)" and "SP Letters (combined)." Please confirm that the volume for single-piece letters includes single-piece cards. If you do not confirm, please explain.
- b. Please provide worksheets "SP Letters (detailed)" and "SP Letters (combined)" for letters only (excluding cards).
- c. Please provide worksheets "SP Letters (detailed)" and "SP Letters (combined)" for cards only (excluding letters).
- d. Refer to the worksheet "SP Letters (combined)." Please confirm that the volume Total should be 43,018,464,782. If you do not confirm, please explain.

- a. Not confirmed. The volumes (and costs) for single-piece letters given in LR58ASP.xls exclude single-piece cards.
- b. See worksheets 'SP Letters (detailed)' and 'SP Letters (combined)' in LR58ASP.xls.
- c. This information will be filed in USPS-LR-J-187, workbook LR187SPCds.xls. Since all single piece cards are assumed to have the same weight in RPW, there is no difference between the detailed and combined analysis.
- d. Confirmed.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO INTERROGATORIES OF THE OFFICE OF CONSUMER ADVOCATE

OCA/USPS-216. Please refer to USPS-LR-J-58, LR58PRE.xls.

a. Refer to worksheets "Presort Letters (detailed)" and "Pre Letters (combined)." Please confirm that the volume for presort letters includes presort cards. If you do not confirm, please explain.

b. Please provide worksheets "Presort Letters (detailed)" and "Pre Letters

(combined)" for presort letters only (excluding presort cards).

c. Please provide worksheets "Presort Letters (detailed)" and "Pre Letters (combined)" for presort cards only (excluding presort letters).

- a. Not confirmed. The volumes (and costs) for presort letters given in LR58ASP.xls exclude presort cards.
- b. See worksheets 'Presort Letters (detailed)' and 'Pre Letters (combined)' in LR58PRE.xls.
- c. This information will be filed in USPS-LR-J-187, workbook LR58PRE_cards.xls, sheets 'Pre Cards (detailed)' and 'Pre Cards (detailed)', respectively.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO INTERROGATORIES OF THE OFFICE OF CONSUMER ADVOCATE

OCA/USPS-217. Please refer to USPS-LR-J-58, LR58AREG.xls.

- a. Refer to worksheets "3CREG Letters (detailed)" and "3CREG Letters (combined)." Please confirm that the volume for Regular letters includes Regular cards. If you do not confirm, please explain.
- b. Please provide worksheets "3CREG Letters (detailed)" and "3CREG Letters (combined)" for Regular letters only (excluding Regular cards).
- c. Please provide worksheets "3CREG Letters (detailed)" and "3CREG Letters (combined)" for Regular cards only (excluding Regular letters).

- a. Confirmed.
- b. c. There is no distinction made in Standard Mail between letters and cards as processing categories or rate elements. Therefore, volumes and costs cannot be separately provided for Standard letters and cards.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO INTERROGATORIES OF THE OFFICE OF THE CONSUMER ADVOCATE

OCA/USPS-218. Please refer to USPS-LR-J-60, pages 46 and 81, column 2, "MODS Productivity."

- a. What factors explain a MODS Productivity for the Incoming CSBCS [Carrier Sequencing Bar Code Sorter] Secondary DPS [Delivery Point Sequence] (3 Pass) that is more than 3 times the MODS Productivity for the Incoming BCS [Bar Code Sorter] Secondary DPS (2 Pass)?
- b. What factors explain a MODS Productivity for the Incoming BCS Secondary DPS (2 Pass) that is more than 3 times the MODS Productivity for the P.O. Box Sort DPS?

RESPONSE:

The Carrier Sequence Bar Code Sorter (CSBCS) can sort mail for one to six (a) carrier routes into Delivery Point Sequence (DPS) during a three-pass operation. The productivity for the CSBCS is likely higher than the productivities for other Bar Code Sorters (BCS) due to the design of the machine itself. The CSBCS has a smaller "footprint" and contains fewer bins (21 or 25) than either the Mail Processing Bar Code Sorter (MPBCS) or the Delivery Bar Code Sorter (DBCS). It is a one-sided, one-tiered machine that is constructed in a "U" shape design. One side of the machine consists of the feeder module and the opposite side contains the bins. Once processing has begun, the mail can be re-loaded directly from the bins to the feeder module for the second and third passes using a "mail bridge." The mail bridge allows processing to continue uninterrupted. In contrast, the MPBCS and DBCS require that mail be swept into trays. These trays must then be properly labeled, loaded back into containers, and transported back to the feed end of the machine for further processing. In addition, there is less sweeping time once the mail has been processed on the CSBCS because the mail is for a limited number of carriers.

RESPONSE OF UNITED STATES POSTAL SERVICE TO INTERROGATORIES OF OFFICE OF CONSUMER ADVOCATE

OCA/USPS-219 Please refer to the testimony of witness Kingsley (USPS-T-39) at page 10, lines 11-12.

- a. Please describe the types of damage referred to in the testimony that occur to machinable and nonmachinable letter-shaped pieces during automated mail processing.
- b. Please confirm that nonmachinable letter-shaped pieces that "impede the mail flow" may cause damage to subsequent machinable letter-shaped pieces during automated processing. If you do not confirm, please explain.
- c. Please confirm that nonmachinable letter-shaped pieces that "impede the mail flow" adversely affect the throughputs of automated mail processing equipment. If you do not confirm, please explain.
- d. Please confirm that nonmachinable letter-shaped pieces that "impede the mail flow" and cause damage to subsequent machinable letter-shaped pieces render such letter-shaped pieces nonmachinable. If you do not confirm, please explain.
- e. Please describe the types of damage referred to in the testimony that occur to automated mail processing equipment caused by nonmachinable letter-shaped pieces.

- (a) The piece can be either torn, crushed, and/or soiled. Also see response to MMA/USPS-T-39-6.
- (b) Confirmed.
- (c) Confirmed. See response to OCA/USPS-44.
- (d) Not confirmed. Some subsequent pieces are only minimally bent or torn and can still be processed in automation.
- (e) Broken belts and rollers, in addition to general wear and tear on the equipment, can shortens the life of replaceable parts.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO INTERROGATORIES OF THE OFFICE OF THE CONSUMER ADVOCATE

OCA/USPS-220:

Please confirm that 99.7 percent of First-Class single-piece letter-shaped pieces weigh less than three ounces. If you do not confirm, please provide the correct percentage under three ounces and cite the source.

RESPONSE:

Confirmed.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO INTERROGATORIES OF THE OFFICE OF THE CONSUMER ADVOCATE

OCA/USPS-221:

Please confirm that 100 percent of First-Class presort letter-shaped pieces weigh less than three ounces. If you do not confirm, please provide the correct percentage under three ounces and cite the source.

RESPONSE:

Not confirmed. There is a small proportion of First-Class presort letter-shaped pieces that weigh more than three ounces. The amount estimated to be less than three ounces is 99.55 percent for non-automation presort First-Class, 99.98 percent for automation presort First-Class and 99.99 percent for automation carrier route First-Class (LR-J-112, Table 12).

RESPONSE OF UNITED STATES POSTAL SERVICE TO INTERROGATORIES OF OFFICE OF CONSUMER ADVOCATE

OCA/USPS-222 Please refer to the response to OCA/USPS-165(e-f), which states that "A piece at the maximum allowable [card] dimensions still weighs less than one ounce."

- a. Please confirm that a card at the maximum allowable dimensions weighs less than one-half ounce. If you do not confirm, please explain,
- b. Please provide the maximum weight for a card at the maximum allowable dimensions.

RESPONSE:

(a-b) There is no maximum weight for cards, and the exact weight of a card at the maximum allowable dimensions has not been determined. However, cards are estimated to weigh one-tenth of an ounce in the Domestic Probability Sampling System.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO INTERROGATORY OF THE OFFICE OF CONSUMER ADVOCATE

OCA/USPS-223. For FYs 1993 through 2002, please provide a tabulation of

- inventory of mail processing equipment by witness Bozzo's site identification number; please include dates of purchase, installation, entry into regular service, and retirement
- b. volumes (TPF, TPH, and FHP) by witness Bozzo's site identification number by postal quarter (PQ) and accounting period (AP) by cost pool (as that term is used by witness Bozzo);
- c. workhours by witness Bozzo's site identification number by PQ and AP by cost pool (as that term is used by witness Bozzo); and
- d. PCN equipment categories for each of the capital indexes in the data set reg9300.xls in LR-J-56.

- a. Please see the response to OCA/USPS-172, part (a).
- b.-c. Please see the response to OCA/USPS-172, parts (b) and (c).
- d. Please see the attachment to this response for a list of the PCNs associated with each equipment capital index in the reg9300.xls data set.

PCN	Category	PCN Description
201000	PSE	POLISHER/SCRUBBER, FLOOR
201010	PSE	POLISHER, FLOOR
201010	PSE	SCRUBBING MACHINE
201025	PSE	2 AXLE SCURBBER & SWEEPER (EMERY)
202000	PSE	VACUUM CLEANER
203010	PSE	SWEEPER, MANUAL
	PSE	SWEEPER, POWERED
203020	PSE	WASHER, CLOTHES
204020	PSE	WASHING/CLEANING MACHINE
204030	PSE	MOWER, LAWN
205000		TRACTOR, LAWN & YARD TYPE
205010	PSE	TRACTOR & MOWER ACCESSORIES
205011	PSE	
205090	PSE	LAWN & YARD, MISCELLANEOUS EQPT
206010	PSE	SPREADER, ICE & SNOW CONTROL SNOW/ICE REMOVAL/CONTROL MISC EQPT
206090	PSE	
208000	PSE	BALER, PAPER
208010	PSE	CART/TRUCK, CUSTODIAL
208020	PSE	CONTAINER TRASH, SCRAP, DISPOSAL
208030	PSE	PACKER/COMPACTER, TRASH, DISPOSAL
210002	PSE	INFRARED VIEWER
210006	PSE	TESTING/MEASURING EQPT, AIR
210010	PSE	TESTING/MEASURING EQPT, DISTANCE
210012	PSE	TESTING/MEASURING EQPT, ELECTRICAL
210014	PSE	TESTING/MEASURING EQPT, FUEL
210016	PSE	TESTING/MEASURING EQPT, LABORATORY
210018	PSE	TESTING/MEASURING EQPT, LIGHT
210020	PSE	TESTING/MEASURING EQPT, OPTICAL
210022	PSE	TESTING/MEASURING EQ, OSCILLOSCOPE
210024	PSE	TESTING/MEASURING EQPT, PHYSICAL
210032	PSE	TESTING/MEASURING EQ, STANDARD SETS
211004	PSE	DRILL
211006	PSE	DRILL PRESS
211008	PSE	FINISHING EQUIPMENT, METAL
211020	PSE	LATHE
211022	PSE	MILLING MACHINE
211028	PSE	PIPE BENDING/CUTTING/THREADING EQPT
211040	PSE	SAWS AND SAW EQUIPMENT
212000	PSE	CHARGER, BATTERY
212010	PSE	COMPRESSOR AIR
212050	PSE	SOLDERING/DESOLDERING EQUIPMENT
212060	PSE	STRAPPING MACHINE, STEEL
212080	PSE	WELDING EQUIPMENT
212090	PSE	MAINTENANCE, MISC TOOLS AND EQPT
213000	PSE	CLEANER, AIR CONDITIONER
213020	PSE	CLEANER, PARTS
214000	PSE	CRANE
214010	PSE	HOIST
214020	PSE	LADDER, SAFETY PLATFORM
214025	PSE	LIFT, BATTERY

PCN	Category	PCN Description
214030	PSE	LIFT, TABLE
214040	PSE	LIFT PLATFORM, CLEANING/MAINTENANCE
215000	PSE	CABINET, TOOL AND PARTS
215010	PSE	RACK, MAINTENANCE
216000	PSE	PAINT SHOP EQUIPMENT, MISCELLANEOUS
220000	PSE	AIR CONDITIONER
220010	PSE	COOLER, ROOM
221010	PSE	GENERATOR
221020	PSE	POWER SUPPLY
222000	PSE	AIR CURTAIN, ENTRANCE/EXIT DOOR
222030	PSE	CONSOLE, CONTROL
222040	PSE	HEATER, PORTABLE
222060	PSE	SIGN, INDOOR/OUTDOOR
222090	PSE	BUILDING EQUIPMENT, MISCELLANEOUS
230000	MHE	DOCKBOARD/DOCKRAMP, PORTABLE
230010	MHE	PLATFORM ELEVATOR/LIFT, PORTABLE
240000	PSE	MOBILE HOME/POST OFFICE
240010	PSE	TRAILER, UTILITY/STORAGE BUILDING
240020	PSE	SHED, STORAGE
240030	PSE	SHELTER, DOCK OR YARD TYPE
300010	PSE	BOOKCASE
300020	PSE	CHAIR
300045	PSE	OFFICE FUNITURE CREDENZA (EMERY)
300050	PSE	DESK/WORKSTATION
300055	PSE	OFFICE FURNITURE DESK (EMERY)
300060	PSE	RACK, OFFICE MISCELLANEOUS
300070	PSE	TABLE
300090	PSE	OFFICE FURNITURE, MISCELLANEOUS
310000	PSE	CABINET, FILE
310004	PSE	CABINET, FILE CARD
310008	PSE	CABINET, FILE LATERAL
310016	PSE	CABINET, FILE/STAND VISIBLE RECORDS
310020	PSE	FILE, AUTOMATED SYSTEM UNIT
310024	PSE	FILE, ROTARY
310028	PSE	FILE, SHELVING
310032	PSE	CABINET, ADP
310040	PSE	CABINET, LABORATORY
310044	PSE	CABINET, MICROFILM/MICROFICHE
310048	PSE	CABINET, STORAGE
321000	PSE	DICTATING/TRANSCRIBING EQUIPMENT
325012	PSE	SEALER, ENVELOPE
325016	PSE	SHREDDER
325090	PSE	OFFICE MACHINES & EQUIPMENT, MISC
340000	PSE	LETTERING EQUIPMENT & SYSTEMS
340020	PSE	SIGN SHOP, MISCELLANEOUS EQUIPMENT
350000	PSE	ADDRESSING MACHINE
350008	PSE	COLLATOR BINDER
350010	PSE	COPYING MACHINE
350012	PSE	CUTTER, PAPER

PCN	Category	PCN Description
350014	PSE	DRILL/PUNCH, PAPER
350032	PSE	FEEDER, PHOTOCOPY EQUIPMENT
350036	PSE	INSERTING EQUIPMENT
350040	PSE	PERFORATOR
350090	PSE	DUPLICATING/PRINTING, MISC EQPT
360000	PSE	ANSWERING/RECORDING UNIT, TELE SYS
360010	PSE	TELEPHONE SYSTEM
360020	PSE	PHONE SYSTERM & LAN (EMERY)
360090	PSE	TELEPHONE SYSTEM, MISC EQUIPMENT
361000	PSE	RADIO, BASE STATION
361020	PSE	RADIO, MOBILE TELEPHONE UNITS
361028	PSE	RADIO, REMOTE CONTROL UNIT OR BASE
361032	PSE	RADIO, REPEATER
361036	PSE	RADIO, SIGNAL BOOSTER
361040	PSE	RADIO, SYSTEM CONTROL CONSOLE
361048	PSE	RADIO, TWO-WAY PORTABLE
361052	PSE	RADIO, TWO-WAY VEHICLE
361090	PSE	RADIO, OTHER MISCELLANEOUS TYPES
362000	PSE	P/A - INTERCOM - MUSIC - SYSTEM
363000	PSE	TELEVISION STATION EQUIPMENT
370000	PSE	ACCESS CONTROL SYSTEM
370002	PSE	SIGNALING SYS/DOCK DOORS (EMERY)
370004	PSE	ACCESS CONTROL SYS BADGE READER
370008	PSE	ACCESS/SECURITY/ALARM EQUIPMENT
370012	PSE	INSP SERVICE CRIME LAB EQPT
370020	PSE	MICROSCOPE
370024	PSE	PHOTO IMAGE ID KIT
370032	PSE	SCOPE, COVERT VEHICULAR
370040	PSE	TRANSMITTER, SURVEILLANCE
370044	PSE	SURVEILLANCE, MISCELLANEOUS EQPT
370048	PSE	X RAY EQUIPMENT, MISCELLANEOUS
390000	PSE	CHANNEL CONTROLLER
390010	PSE	DISK PACK
390020	PSE	DISK STORAGE DRIVE
390030	PSE	MAGNETIC TAPE UNIT
390034	PSE	MAGNETIC TAPE UNIT, AUTOMATED
390040	PSE	MEMORY STORAGE UNIT
390044	PSE	MEMORY STORAGE, CONTROLLER
390050	PSE	PRINTER
390054	PSE	PRINTING SYSTEM
390060	PSE	PROCESSOR, MAINFRAME
390064	PSE	PROCESSOR, MAINFRAME CONTROLLER
390068	PSE	PROCESSOR, OPERATOR CONSOLE/STATION
390070	PSE	SWITCHING UNIT
390510	PSE	COOLING SYSTEM, ADP
390516	PSE	POWER UNIT
390518	PSE	POWER PROTECTION/ALARM UNIT
390550	PSE	ADP CLEANING/MAINTENANCE EQPT
390560	PSE	ADP TESTING/ANALZ/MONITORING EQPT

PCN	Category	PCN Description
391000	PSE	MODEM
391010	PSE	MULTIPLEXOR
391020	PSE	TELECOMMUNICATIONS UNIT
392000	PSE	DATA ENTRY SYSTEM
392010 ⁻	PSE	MICR DATA ENTRY/CAPTURE SYS
392500	PSE	SCANNER, CONTROLLER
392510	PSE	SCANNER, FIXED UNIT
392520	PSE	SCANNER, PORTABLE UNIT
393010	PSE	TERMINAL, CRT/VDT
393020	PSE	TERMINAL, TRANSACTION
393060	PSE	TERMINAL, TELECOPIER
394000	PSE	MINI COMPUTER SYSTEM
394005	PSE	SERVER-WORKSTATION (EMERY)
394010	PSE	MINI COMPUTER PROCESSOR
394020	PSE	MINICOMPUTER SOFTWARE
395000	PSE	MICRO COMPUTER SYSTEM
395010	PSE	MICRO CONTROLLER
395020	PSE	MICRO CRT/VDT
395030	PSE	MICRO DISK DRIVE
395050	PSE	MICRO MEMORY STORAGE UNIT
395060	PSE	MICRO PROCESSOR
395070	PSE	MICRO TAPE DRIVE
395080	PSE	MICRO PRINTER
395090	PSE	MICROCOMPUTER SOFTWARE
395400	PSE	TIME & ATTENDANCE SYS(TACS)
395500	PSE	ASSOCIATE OFFICE INFRASTRUCTURE
395510	PSE	AOI/NETWORK-RTR,SPLS/SVCS,LAN WIRE
395510	PSE	AOI/NETWORK-RTR,SPLS/SVCS,LAN WIRE
395520	PSE	AOI/USER-SERVER,MONTOR,PRINTER
395530	PSE	SRVR LAN WIRG & FBR OPTICS (EMERY)
396000	PSE	WORD PROCESSING SYSTEM
397020	PSE	GRAPHICS SYSTEM, DISPLAY UNIT
397030	PSE	GRAPHICS SYSTEM, PLOTTER
398004	PSE	ADAPTER, ADP
398032	PSE	RECORDER, COMPUTER IMAGE
399000	PSE	AIR CONTRACT DATA COLL SYS, ACDCS
399010	PSE	DELIVERY RECEIPT SYSTEM, ADR
399020	PSE	HVAC ENERGY MANAGEMENT SYSTEM
399030	PSE	REGISTER DISPATCH SYS, ADSRM
399040	PSE	COMPUTERIZED ON-SITE DATA ENTRY SYS
399050	PSE	COMM.MANINT.OPER.MAN.SYS (CMIOM)
399500	PSE	DUPLICATOR, MICROFILM/MICROFICHE
400000	MHE	CULLING MACHINE
400010	MHE	DUAL PASS ROUGH CULL SYSTEM (DPRCS)
401020	MHE	CANCELLING/FACING MACHINE
401030	MHE	CANCELLING MACHINE
401040	MHE	CANCELLER FLAT
402000	MHE	DIVERTER EDGER FEEDER ATTACHMENT
402040	MHE	STACKER UNIT

PCN	Category	PCN Description
420000	MHE	CONVEYOR
420005	MHE	CONVERYOR SYS & CONTROL (EMERY)
420010	MHE	CONVEYOR, EXTENDIBLE
420030	MHE	CONVEYOR, TRACTOR
420050	MHE	DUMPER, HAMPER
421000	MHE	RACK, TRAY STORAGE
421020	MHE	ULD RACK-4-WAY & BALL (EMERY)
422000	MHE	STRAPPING MACHINE, NON-METALLIC
422005	MHE	STRAPPING MACHINE (EMERY)
422010	MHE	STRAPPING SYSTEM
422020	MHE	TYING MACHINE
423000	MHE	TRACTOR, ATTACHMENTS & ACCESSORIES
423005	MHE	BTRY BCKUP CHGR SYS FRKLFT (EMERY)
423005	MHE	TRACTOR, INDUSTRIAL & FARM TYPE
423010	MHE	TRACTOR, TOW/TUG/WAREHOUSE
423025	MHE	2 AXLE TOW TUG (EMERY)
	MHE	TRACTOR, W/AUTO GUIDANCE SYSTEM
423030 423040	MHE	TRUCK, FORK LIFT
	MHE	ELECTRIC FORK LIFT (EMERY)
423045	MHE	TRUCK, HAND LIFT/PALLET
423050	MHE	HAND PALLET TRUCK (EMERY)
423055	MHE	TRUCK, LIFT SPECIALIZED SYSTEM
423060	MHE	HAND PALLET TRUCK 5000LBS (EMERY)
423065	MHE	2 AXLE RIDER PALLET (EMERY)
440005	MHE	CARRIER, PERSONNEL
440010	MHE	LABEL PRINTING SYSTEM
441000	MHE	PRINTER, ADDRESS LABEL
441010	MHE	REWRAP OR PATCH-UP EQUIPMENT
442010	MHE	SCALE, FLOOR OR PLATFORM
443000	MHE	DECK SCALE, BALL RAM (EMERY)
443005 443015	MHE	ANGLE SCALE (EMERY)
601000	PSE	ANALYZER, VEHICLE MAINTENANCE
	PSE	ENGINE MAINTENANCE EQUIPMENT
601010	PSE	TEST EQ, VEHICLE TUNE-UP/DIAGNOSIS
601040 601050	PSE	TEST EQ, VEHICLE EXHAUST
602010	PSE	JACK
602030	PSE	LIFT, VEHICLE
602050	PSE	TRUCK, FORK LIFT/TOW, VEHICLE MAINT
	PSE	PUMP, SERVICING/DISPENSING
603000	PSE	SERVICING/DISPENSING EQUIPMENT
603010	PSE	TANK, GAS
603020	PSE	TIRE MAINTENANCE EQUIPMENT
604000		CLEANING EQUIPMENT, VMF MAINTENANCE
605000	PSE PSE	WASHER, VEHICLE
605010	PSE	WHEEL/SUSPENSION MAINTENANCE EQPT
606000	PSE	BRAKE MAINTENANCE EQUIPMENT
607000	PSE	CHARGER, BATTERY - VEHICLES
608000	PSE	STARTER, VEHICLE
609030	PSE	VMF MAINTENANCE EQ, MISCELLANEOUS
609090	rot	VIVIE WANTENANCE EQ, WILDOLLEAGE

PCN	Category	PCN Description
731000	PSE	SAFE
731010	PSE	SAFE, VAULT SHELL
731020	PSE	SECURITY CONTAINER WITH CABINET
731030	PSE	VAULT DOOR/ENTRANCE
800000	PSE	CAFE EQ, CABINET
800012	PSE	CAFE EQ, DINING TABLE
800014	PSE	CAFE EQ, DISH WASHER
800022	PSE	CAFE EQ, FREEZER
800024	PSE	CAFE EQ, FRYER
800032	PSE	CAFE EQ, ICE DISPENSER
800034	PSE	CAFE EQ, ICE MAKER
800044	PSE	CAFE EQ. MISC COOKING & HEATING
800046	PSE	CAFE EQ. MISC FOOD PREPARATION EQPT
800052	PSE	CAFE EQ, OVEN
800056	PSE	CAFE EQ, RANGE
800058	PSE	CAFE EQ. REFRIGERATOR
801040	PSE	MEDICAL TREATMENT EQPT & DEVICES
803036	PSE	TRAINER, MISC HVAC & BLDG SYSTEMS
803052	PSE	TRAINING SYSTEM, AUDIO VISUAL
804000	PSE	CAMERA, ID
810000	PSE	CAMERA
810050	PSE	CAMERA, VIDEO
810060	PSE	CAMERA ACCESSORIES
810070	PSE	LENS
811000	PSE	CABINET/SPECIAL FURN, FILM PROCESS
811030	PSE	PRINTER, FILM PROCESSING
811090	PSE	FILM PROCESSING, MISCELLANEOUS EQPT
820000	PSE	PROJECTOR, COMPUTER IMAGE
820010	PSE	PROJECTOR, MOVIE
820030	PSE	PROJECTOR, OVERHEAD
820040	PSE	PROJECTOR, SLIDE
820050	PSE	PROJECTOR, STRIP FILM
820060	PSE	PROJECTOR, TELEVISION
820070	PSE	SCREEN, PROJECTION
820090	PSE	PROJECTOR ACCESSORIES & MISC EQPT
821000	PSE	AMPLIFIER, POWER/SOUND
821030	PSE	SPEAKER SYSTEM
822000	PSE	AUDIO, PLAYER/RECORDER
823000	PSE	AUDIO-VISUAL SPECIAL EFFECTS EQPT
823020	PSE	LIGHTS & LIGHTING, SPECIALIZED
823030	PSE	VISUAL PRESENTATION EQUIPMENT
823090	PSE	AUDIO-VISUAL MISCELLANEOUS EQPT
830000	PSE	CLOSED CIRCUIT TV SYSTEM
830010	PSE	INTERCOM, CLOSED CIRCUIT TV
830020	PSE	MONITOR, TV
830030	PSE	TELEVISION
830040	PSE	VIDEO, PLAYER/RECORDER
830050	PSE	VIDEO SPECIAL EFFECTS EQUIPMENT
851090	PSE	MAILBAG FACILITY MISCELLANEOUS EQPT

PCN	Category	PCN Description
900000	MHE	BULK CONVEYOR
900010	MHE	FIXED MECH MEMORY CONT SYS
900020	MHE	LOOSE MAIL CONVEYOR SYSTEM
900030	MHE	MAIL PREPARATION SYSTEM
900035	MHE	MONORAIL SORTING SYSTEM
900040	MHE	MULTIBELT SORTING SYSTEM
900060	MHE	PALLET UNLOADER
900070	MHE	PP DISTRIBUTION RING
900080	MHE	TRAY TRANSPORT SYSTEM
900090	MHE	REMANUFACTURED MISC MAIL PROC EQPMT
910000	MHE	LETTER SORTING MACHINE, MULTI POS
910020	MHE	LSM TRAY CONVEYOR SYSTEM
911000	MHE	LSM(AFCS-DBCS DIRECT CONNECT SYS)
920000	MHE	FLAT SORTER MACHINE
920040	MHE	FLAT SORTER FEED UNIT
921010	MHE	FLATS FORWARDING TERMINAL
921020	MHE	ALERT SPRKLR/RAPISTAN EQUIP (EMERY)
921030	MHE	VOICE NETWKNG/RAPISTAN EQUIP(EMERY)
921040	MHE	WOOD FLR SYS/ RAPISTAN EQUIP(EMERY)
921050	MHE	CNTR BELT & CONVR RAPISTAN (EMERY)
921060	MHE	SORTATION EQUIP RAPISTAN (EMERY)
921070	MHE	CHUTE EQUPMENT RAPISTAN (EMERY)
930000	MHE	PARCEL SORTING MACHINE
930040	MHE	SMALL PARCEL/BUNDLE SORTER SYSTEM
930050	MHE	SMALL PARCEL/ROLL SORTER SYSTEM
940000	MHE	SACK SORTING MACHINE
950000	AHE	BAR CODE READER
950010	AHE	SMALL BAR CODE SORTER (SBCS)
950020	AHE	DELIVERY BAR CODE SORTERS (DBCS)
960000	AHE	READER, OPTICAL CHARACTER
960010	AHE	READER, OPTICAL CHARACTER (OCR/CS)
960020	AHE	REMOTE BAR CODING IMAGE PROCESS SYS
970000	MHE	BMC CONTAINER LOADER/UNLOADER
970020	MHE	BMC PARCEL SORTING INDUCTION UNIT
970022	MHE	BMC PARCEL SORTING MACHINE
970030	MHE	BMC PROCESS CONTROL SYSTEM
970040	MHE	BMC SACK SHAKEOUT MACHINE
970050	MHE	BMC SACK SORTER AND LOADER
970060	MHE	BMC TOWVEYOR - INTERNAL TOW CONV
980020	MHE	SAFETY IMPROVEMENT SYS, BULK MAIL CT
999998	MHE	INSTALL COST, NON-FIXED MECHANIZATN
999999	MHE_	INSTALLATION COST FIXED MECHANIZATN

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO INTERROGATORY OF THE OFFICE OF CONSUMER ADVOCATE

OCA/USPS-224. For FYs 1993 through 2002, please provide the planned and actual FHP volume by AP and the planned and actual workhours by AP by witness Bozzo's site identification number for each MODS cost pool used in the variability analysis. (See MODS handbook M-32, sections 432.2 and 432.4, December 1, 1987, for discussion of the planned variables.)

RESPONSE:

The requested data are not available from the Postal Service's MODS database.

Please note that entry of planned FHP and workhours is optional. See sections 432.21 and 432.41 of the cited M-32 handbook (Rev. 1987, USPS-LR-H-147 in Docket No. R97-1); see also USPS-LR-J-165, section 4-10. For a list of available MODS variables, please see the MODS data dictionary, provided in Docket No. R2000-1, USPS-LR-I-201.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

Nan K. McKenize

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260–1137 November 28, 2001